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UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY

In the Matter of:

CHAPTER 11  
BK. NO. 08-26178-NLW

JESAL PATWARI

Debtor.

NOTICE OF MOTION TO VACATE  
AUTOMATIC STAY

TO: Jesal Patwari, Debtor  
Gary N. Marks, Esq., Attorney for Debtor  
Karamvir Dahiya, Esq., Attorney for Debtor  
U.S. Trustee  
Creditors Holding 20 Largest Unsecured Claims

PLEASE TAKE NOTICE that on March 30, 2009 at 9:00 a.m, or as soon as the matter may be heard, the undersigned, attorneys for Secured Creditor America's Wholesale Lender, its assignees and/or successors in interest, will move before the Honorable Novalyn L. Winfield of the United States Bankruptcy Court, King Federal Building, 50 Walnut Street, 3rd Floor, Newark, New Jersey 07102, for the entry of an Order vacating the Automatic Stay with respect to the Debtor's property located at **1032 Waterford Drive, Edison, New Jersey**, and allowing Secured Creditor to continue or institute a foreclosure action, by reason of the failure of Debtor to make the regular monthly payments.

Secured Creditor further moves for an Order waiving the 10-day stay described by Bankruptcy Rule 4001(a)(3).

Secured Creditor further moves or an Order allowing Secured Creditor to, at its option, offer, provide and enter into any potential forbearance agreement, loan modification, refinance agreement or other loan workout/loss mitigation agreement. Secured Creditor, through its servicing agent Countrywide Home Loans Servicing, LP., may contact the Debtor via telephone or written correspondence to offer such an agreement. Any such agreement shall be non-recourse unless included in a reaffirmation agreement.

Dated: March 10, 2009

MINION & SHERMAN  
Attorneys for Secured Creditor

By /s/ Scott Sherman  
SCOTT SHERMAN, ESQUIRE  
Local Counsel